

**RECEIVED**

MAR 31 2020

CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTAUNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTAJill McGRAND-MEHRALIAN  
AND ALI MEHRALIAN

Plaintiff(s),

vs.

PARKLAND ESTATES H.O.A.,  
MATHEW S GREENSTEIN  
AND CHERYL M DONLEY

Defendant(s).

Case No. 20-cv-855 NEB/HB  
(To be assigned by Clerk of District  
Court)DEMAND FOR JURY  
TRIAL

YES \_\_\_ NO \_\_\_

(Enter the full name(s) of ALL plaintiffs  
and defendants in this lawsuit. Please  
attach additional sheets if necessary.)COMPLAINT

## PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

## a. Plaintiff

Name

Jill McGRAND-MEHRALIAN  
ALI MEHRALIAN

Street Address

8971 PARTRIDGE RD.

County, City

HENNEPIN, ST. BONIFACIUS

State &amp; Zip Code

MINNESOTA 55375

Telephone Number

612-432-8334

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

SCANNED

MAR 31 2020

U.S. DISTRICT COURT MPLS

a. Defendant No. 1

Name (H.O.A.) LAND PARK ESTATE HOME OWNER ASSOCIATION  
 Street Address 825 NICOLLET MALL, SUITE 1648  
 County, City HENNEPIN, MINNEAPOLIS  
 State & Zip Code MINNESOTA, 55402  
 AND ANY/ALL EMPLOYEES, ET AL....

b. Defendant No. 2

Name MATHEW S. GREENSTEIN  
 Street Address 825 NICOLLET MALL, SUITE 1648  
 County, City HENNEPIN, MINNEAPOLIS  
 State & Zip Code MINNESOTA 55402

c. Defendant No. 3

Name CHERYL M DONLEY, AND CITIES  
 Street Address MANAGEMENT, INC  
2100 SUMMER ST. NE.  
 County, City HENNEPIN, MINNEAPOLIS  
 State & Zip Code MINNESOTA 55413

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of

the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

AMERICANS WITH DISABILITIES ACT, REASONABLE ACCESS FOR WHEEL CHAIR, HANDICAP, DISABLED, MEMBER TO HER UNIT, DENIED. X EQUAL PROTECTION CLAUSE/AMENDMENT... ETC. HOMESTEAD QUIET ENJOYMENT... VIOLATIONS

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

✓ Check here if additional sheets of paper are attached.

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. \_\_\_\_\_

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

# REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Date: 3-30-2020

ALL MEHRALIAN ON HIS OWN BEHALF AND HIS DECEASED WIFE, MS. JILL R. McGRAND-MEHRALIAN SIGNATURE.

1-  2- Signature of Plaintiff

Mailing Address

8941 PARTRIDGE RD.

AS AUTHORIZED  
PERSONAL REPRESENTATIVE  
OF ESTATE (BY PROBATE COURT)  
FOR HIS WIFE & HIM

Telephone Number

ST. BONIFACIUS MINN

HENNEPIN COUNTY, 55375

612-432-8334

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.